

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

VALLEY CHABAD, INC. and RABBI  
DOV DRIZIN,

Plaintiffs,

v.

BOROUGH OF WOODCLIFF LAKE,  
N.J., ZONING BOARD OF  
ADJUSTMENT OF THE BOROUGH OF  
WOODCLIFF LAKE, N.J., et al.

Defendants.

Civil No. 2:16-cv-08087-KSH-JAD

**PLAINTIFFS' MOTION TO COMPEL DISCOVERY AND  
FOR SANCTIONS PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 37**

COME NOW Plaintiffs, Valley Chabad, Inc. and Rabbi Dov Drizin ("Plaintiffs") and move this Court to compel answers to interrogatories, responses to Plaintiffs' requests for production of documents, and documents responsive to Plaintiffs' requests for production from Defendants, Borough of Woodcliff Lake ("Borough"), Zoning Board of Adjustment of the Borough of Woodcliff Lake ("Board"), Carlos Rendo, and Paul Bechtel (collectively "Defendants"), pursuant to Rules 33, 34 and 37 of the Federal Rules of Civil Procedure and Local Rules 26.1 and 37.1, and for an award of attorney's fees and costs associated with the filing of the within Motion, and for additional relief as set forth herein.

Plaintiffs hereby incorporate their Memorandum in support of this Motion as well as the Declaration of Robin N. Pick accompanying same.

Respectfully submitted,

/s/ Robin N. Pick  
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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was sent via ECF on June 7, 2019, to all counsel of record, including:

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